

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Attorney for the Standing Trustee

IN RE:
KEITH ROPER

MICHAEL G. BOYD, ESQ.
157 ENGLE STREET
ENGLEWOOD, NJ 07631

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No.: 05-47622G

NOTICE OF MOTION TO DISMISS OR IN
THE ALTERNATIVE, FOR AN ORDER
DIRECTING THE EMPLOYER TO PAY
THE TRUSTEE, OR AND ORDER FOR A
DEFAULT CLAUSE

HEARING DATE: 3/18/2009

ORAL ARGUMENT REQUESTED

KEITH ROPER
160 TERRACE AVE
APT. 3E
HASBROUCK HEIGHTS, NJ 07604

PLEASE TAKE NOTICE, that on 03/18/2009 at 9:00 am in the forenoon or as soon thereafter that counsel may be heard, the undersigned, as attorney for Marie-Ann Greenberg, Standing Trustee will move before Honorable Judge ROSEMARY GAMBARDELLA, at US Bankruptcy Court, 50 Walnut Street, Third Floor, Newark, NJ 07102, for an Order Dismissing this case for failure to make payments as provided in the said Order of Confirmation; or in the alternative, for an Order directing the employer of the Debtor(s) to withhold from the wages of the Debtor, and pay directly to the Trustee, as provided for in the plan for the debtor heretofore confirmed by Order of this Court.

The undersigned will rely on the attached Certification in support of this motion plus an oral report updating the information on the return date of this motion.

Marie-Ann Greenberg, Esquire
Standing Chapter 13 Trustee

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire

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CERTIFICATION IN SUPPORT OF MOTION

I, Jackie Michaels, being of full age certify that:

1. I am an administrator for Marie-Ann Greenberg, Standing Trustee, and am familiar with the facts of this case.
2. The debtor(s), as of the date of this certification are delinquent a total of \$2,473.38.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willingly false, that I am subject to punishment.

Dated: February 10, 2009

By: /S/ Jackie Michaels
Jackie Michaels
Administrator

Marie-Ann Greenberg, MAG-1284
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DISTRICT OF NEW JERSEY

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CERTIFICATE OF SERVICE

On February 10, 2009, the undersigned served to MICHAEL G. BOYD, ESQ. and KEITH ROPER a copy of the within Notice of Motion.

Notice of Motion was served via US Mail or electronically via ECF.

Dated: February 10, 2009

By: /S/ Jackie Michaels
Jackie Michaels
Administrator